

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD  
Michael M. Gibson, Chairman  
Dr. Michael F. Kennedy  
Dr. William W. Sager

In the Matter of

FLORIDA POWER & LIGHT COMPANY

Docket Nos. 50-250-LA  
and 50-251-LA

(Turkey Point Nuclear Generating,  
Units 3 and 4)

ASLBP No. 15-935-02-LA-BD01

September 25, 2015

INTERIM NOTICE OF SUPPLEMENTAL DISCLOSURES

In accordance with the Atomic Safety and Licensing Board's Initial Scheduling Order in the subject matter dated May 8, 2015 Citizens Allied for Safe Energy, Inc. (CASE) is providing a Notice of Supplemental Disclosures advising all parties listed in the attached COS by electronic mail of CASE documents which might be cited and potential witnesses for the evidentiary hearing scheduled for the week of January 11, 2016. as required by 10 C.F.R. §§ 2.336(a)-(b) and 2.1203(a).

## FOIA REQUESTS

### **Miami Dade County**

**Regulatory and Economic Resources (DERM)**

**August 26, 2015 - .5GB of information provided**

**For a copy please contact**

**Ms. Gwen Burzycki, burzyg@miamidade.gov**

### **National Park Service**

**August 5, 2015 - No information yet provided**

## TOUHY REQUEST

### **National Park Service**

**August 23, 2015**

### **Witnesses requested:**

**Superintendent Brian Carlstrom - Biscayne National Park**

**Ecologist Sarah Belmund - Biscayne National Park**

**On September 3, 2015 CASE received the following email from the NPS:**

**Stevens, Michael** <mike.stevens@sol.doi.gov>

To

Barry J White

CC

Brian Carlstrom Joan Lawrence Sarah Bellmund Donald Jodrey

Sep 3 at 12:36 PM

Mr. White:

To summarize what I said during our telephone conversation: because the NRC hearing for which you are seeking the testimony of National Park Service employees is a federal administrative process, the Touhy regulations do not apply. You will have to follow NRC's administrative procedures in order to attempt to obtain this testimony.

I apologize for any confusion. FYI I am going to be out of the office from September 8 through September 18, and again from September 22 through 25.

Michael Stevens  
Attorney-Adviser  
Office of the Regional Solicitor  
Southeast Region  
404-331-4447, x238

**EXPERT WITNESSES FOR WHOM CASE INTENDS TO SEEK  
SUPOENAS TO PROVIDE SWORN TESTIMONY**

**Mr. Lee N. Hefty**  
**Director of Environmental Resources Management (DERM),**  
**Miami-Dade Department of Regulatory and Economic Resources**

**Mr Craig Grossenbacher**  
**Geologist, Environmental Resources Management (DERM),**  
**Miami-Dade Department of Regulatory and Economic Resources**

**Mr. Brian Carlstrom**  
**Superintendent, Biscayne National Park**

**Ms. Sarah Bellmund**  
**Ecologist, Biscayne National Park**

**REFERENCES OTHER THAN NRC REGULATIONS  
WHICH MIGHT BE CITED;**

- 1) Turkey Point Unit 1 Eco System BY RUSS FINLEY ON MAR 3, 2015  
<http://www.energytrendsinsider.com/2015/03/03/turkey-point-power-station-and-its-ecosystem/>

2) Saltwater Intrusion of Coastal Aquifers in the U.S. James Spatafo

Johnson State College Senior Seminar May 6, 2008

<http://kanat.jsc.vsc.edu/student/spatafora/setup.htm>

3)

[Emergency Order No. 2015-034-DAO-WU \[PDF\] - South ...  
www.sfwmd.gov/.../sfwmd.../f...](#)

4)

[Short-Term Water Withdrawals by FPL – April 9, 2015 \[PDF\]  
www.sfwmd.gov/.../sfwmd.../3...](#)

5) **USGS Saltwater Study.pdf**

Origins and Delineation of Saltwater Intrusion in the Biscayne Aquifer and

Changes in the Distribution of Saltwater in Miami-Dade County, Florida

Scientific Investigations Report 2014–5025

**U.S. Department of the Interior**

**U.S. Geological Survey**

Executed in Accord with 10 CFR § 2.304(d).

Respectfully submitted,

/S/ (Electronically) Barry J. White  
Authorized Representative  
Citizens Allied for Safe Energy, Inc.  
10001 SW 129 Terrace'  
Miami, FL 33176  
305-251-1960  
[bwtamia@bellsouth.net](mailto:bwtamia@bellsouth.net)

Dated at Miami, Florida  
this 25th day of September, 2015

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

Michael M. Gibson, Chairman  
Dr. Michael F. Kennedy  
Dr. William W. Sager

In the Matter of	)	
	)	
FLORIDA POWER & LIGHT COMPANY	)	Docket Nos. 50-250-LA and
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(Turkey Point Nuclear Generating	)	ASLBP No. 15-935-02-LA-BD01
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September 25, 2015

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing CITIZENS ALLED FOR SAFE ENERGY INTERIM NOTICE OF SUPPLEMENTAL DISCLOSURES AUGUST 28, 2015 have been served upon the following persons by electronic mail:.

CERTIFICATE OF SERVICE

Turkey Point, Units 3 & 4, Docket Nos. 50-250 and 50-251-LA

CITIZENS ALLED FOR SAFE ENERGY INTERIM NOTICE OF

SUPPLEMENTAL DISCLOSURES September 25, 2015

U.S. Nuclear Regulatory Commission  
Atomic Safety and Licensing Board  
Mail Stop: T-3 F23  
Washington, DC 20555-0001

Michael M. Gibson, Chair  
Administrative Judge  
E-mail: [michael.gibson@nrc.gov](mailto:michael.gibson@nrc.gov)

Dr. Michael F. Kennedy  
Administrative Judge  
E-mail: [michael.kennedy@nrc.gov](mailto:michael.kennedy@nrc.gov)

Dr. William W. Sager  
Administrative Judge  
E-mail: [william.sager@nrc.gov](mailto:william.sager@nrc.gov)

Matthew Zogby, Law Clerk  
E-mail: [matthew.zogby@nrc.gov](mailto:matthew.zogby@nrc.gov)

U.S. Nuclear Regulatory Commission  
Office of Commission Appellate Adjudication  
Mail Stop: O-7H4  
Washington, DC 20555-0001  
[ocaamail@nrc.gov](mailto:ocaamail@nrc.gov)

U.S. Nuclear Regulatory Commission  
Office of the Secretary of the Commission  
Mail Stop: O-16C1  
Washington, DC 20555-0001  
E-mail: [hearingdocket@nrc.gov](mailto:hearingdocket@nrc.gov)

U.S. Nuclear Regulatory Commission  
Office of the General Counsel  
Mail Stop: O-15 D21  
Washington, DC 20555-0001  
Brian Harris, Esq.  
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Edward Williamson, Esq.  
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CERTIFICATE OF SERVICE

Turkey Point, Units 3 & 4, Docket Nos. 50-250 and 50-251-LA

CITIZENS ALLED FOR SAFE ENERGY INTERIM NOTICE OF

SUPPLEMENTAL DISCLOSURES September 25, 2015

Florida Power & Light Company  
700 Universe Blvd.  
Juno Beach, Florida 33408  
Nextera Energy Resources  
William Blair, Esq.  
E-mail: [william.blair@fpl.com](mailto:william.blair@fpl.com)

Citizens Allied for Safe Energy, Inc. (CASE)\*  
10001 SW 129 Terrace  
Miami, FL 33176  
Barry J. White  
E-mail: [bwtamia@bellsouth.net](mailto:bwtamia@bellsouth.net)

Florida Power & Light Company  
801 Pennsylvania Ave. NW Suite 220  
Washington, DC 20004  
Steven C. Hamrick, Esq.  
E-mail: [steven.hamrick@fpl.com](mailto:steven.hamrick@fpl.com)

Executed in Accord with 10 CFR § 2.304(d).

Respectfully submitted,

/S/ (Electronically) Barry J. White  
Authorized Representative  
Citizens Allied for Safe Energy, Inc.  
10001 SW 129 Terrace'  
Miami, FL 33176  
305-251-1960  
[bwtamia@bellsouth.net](mailto:bwtamia@bellsouth.net)

Dated at Miami, Florida  
this 25th day of September, 201

**From:** [Barry White](#)  
**To:** [Docket Hearing](#)  
**Cc:** [william.blair@fpl.com](#); [England, Christina](#); [Gibson, Michael](#); [steven.hamrick@fpl.com](#); [Harris, Brian](#); [Kanas, Catherine](#); [Kennedy, Michael](#); [OCAAMAIL Resource](#); [Pepper, Nicole](#); [Roth\(OGC\), David](#); [Sager, William](#); [Straus, Daniel](#); [stefen@nealgross.com](#); [Tinketts, John](#); [bwtamia@bellsouth.net](#); [Williamson, Edward](#); [Zogly, Matthew](#)  
**Subject:** CASE INTERIM NOTICE OF SUPPLEMENTAL DISCLOSURES September 25, 2015  
**Date:** Friday, September 25, 2015 11:51:24 AM  
**Attachments:** [CASE Notice Of Supplemental Disclosures September 25, 2015 copy 7 pages.pdf](#)  
[COS September 25, 2015 Turkey Point 3 & 4 \(50-250 and 50-251-LA\)-3 2 copy 7 pages.pdf](#)

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Please enter the attached  
Disclosure and COS into the ADAMS system.

Thank you.

Executed in Accord with 10 CFR § 2.304(d).

Respectfully submitted,

/S/ (Electronically) Barry J. White

Barry J. White  
Authorized Representative  
Citizens Allied for Safe Energy, Inc.  
10001 SW 129 Terrace  
Miami, FL 33176  
305-251-1960  
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Dated at Miami, Florida  
this 25th day of September, 2015